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Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MICHIGAN LICENSED BEVERAGE
ASSOCIATION, a Michigan corporation,

Plaintiff,

v.

AREP, INC. d/b/a ACE BARTENDING
ACADEMY, a Nevada corporation; and
DAVID DOLINSKY, individually

Defendants.

Case No.: 2:20-cv-01664-JAD-VCF

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO AMEND
PLEADINGS OR ADD PARTIES**

(First Request)

Plaintiff Michigan Licensed Beverage Association (Plaintiff), and Defendants AREP, Inc., d/b/a Ace Bartending Academy and David Dolinsky (Defendants) (together, the Parties) hereby stipulate to extend the deadlines to amend pleadings and to add parties. The Parties agree to extend these deadlines by 30 days to May 6, 2021. This Stipulation is the first request to extend deadlines in this case.

In support of this Stipulation, the Parties have conducted the following discovery:

1. DISCOVERY COMPLETED TO DATE:

The Parties have exchanged disclosures, written discovery has been propounded, and the deposition of Defendant David Dolinsky has been taken.

1 **2. DISCOVERY REMAINING TO BE COMPLETED:**

2 The Parties will continue to respond to outstanding written discovery requests, to issue
3 subpoenas to third parties, and to conduct depositions.

4 **3. REASON FOR REQUEST FOR EXTENSION OF DISCOVERY DEADLINES:**

5 Good cause exists to extend the deadline to amend pleadings or add parties in this matter
6 because the deposition of Mr. Dolinsky took place on March 11, 2021, and Plaintiff is still in the
7 process of reviewing the transcript. Additionally, the Parties have been working together to settle
8 the matter. The Parties do not believe that any of the other discovery deadlines need to be extended
9 at this time. This extension is not for purposes of delay.

10 Pursuant to the above, the Parties wish to extend the deadline to amend pleadings and add
11 parties to May 6, 2021. The deadlines shall be as follows:

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4. PROPOSED SCHEDULE FOR COMPLETING DISCOVERY:

Scheduled Event	Current Deadline	Proposed Deadline
Close of Discovery	July 5, 2021	Remains the same
Amend Pleadings/Add Parties	April 6, 2021	May 6, 2021
Initial Expert Disclosure Deadline	May 6, 2021	Remains the same
Rebuttal Expert Deadline	June 7, 2021	Remains the same
Dispositive Motion Deadline	August 4, 2021	Remains the same
Pretrial Order	September 3, 2021	Remains the same

SO STIPULATED on March 17, 2021.

DATED March 17, 2021.

/s/ Dan McNutt

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DATED March 17, 2021.

/s/ Ryan Gile

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Counsel for Plaintiff

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

March 17, 2021